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Security Council Committee established pursuant to resolution 1267 (1999)

Letter dated 25 April 2003 from the Permanent Representative of Italy to the United Nations addressed to the Chairman of the Committee

Following your letter dated 4 March 2003, I have the pleasure to enclose herewith the report of Italy to the Security Council Committee established pursuant to Security Council resolution 1267 (1999), submitted in accordance with Security Council resolution 1455 (2003).

(*Signed*) Marcello **Spatafora**

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Annex to the letter dated 25 April 2003 from the Permanent Representative of Italy to the United Nations addressed to the Chairman of the Committee

Report of Italy to the Committee established pursuant to Security Council resolution 1267 (1999), submitted in accordance with resolution 1455 (2003)

Introduction

This report illustrates the measures adopted in Italy to implement Resolution 1455/2003 establishing a series of sanctions against the Taliban, Al-Qaida, Usama Bin Laden and their associates, decreeing the freezing of their assets, the ban on entry and transit, and the supply of weapons and related materials.

This report should be read also in the light of the two reports presented in 2001 and 2002 to the Security Council Counter-Terrorism Committee (CTC), and the report submitted to the Committee set up by Resolution 1267 in 2002 providing detailed in-depth responses on this issue. For this reason, in those cases where no further changes have been made with respect to the situation described previously, the present report refers at several points to information already provided in the recent past.

New elements that should be underlined include the ratification of the Conventions for the suppression of the financing of terrorism and the suppression of terrorist bombing, thanks to which Italy is now a party to all the international conventions against terrorism, as promptly notified to the CTC.

Furthermore, the investigations carried out by our Police Forces have enabled us to ascertain the presence in Italy of citizens suspected of being in contact with members of Al-Qaida. These investigations are being carried out in several regions and have enabled us, to date, to break up terrorist cells engaged in providing logistical support for terrorists in transit, the procurement of false documents, proselytism and the recruitment of new members.

Also worthy of note is the attached* table regarding the freezing of goods and funds in Italy, drawn up under the guidance of the competent authority in our country, the Financial Security Committee (FSC).

* The enclosure referred to in the report is on file with the Secretariat, room S-3055, and is available for consultation.

I Introduction

1. Please provide a description of activities, if any, by Usama Bin Laden, Al-Qaida, the Taliban and their associates in your country, the threat they pose to the country and the region, as well as likely trends.

Although fundamentalist Muslim terrorist organisations have never carried out any attacks in Italy, the Italian forces of law and order (Police and Carabinieri) have carried out a series of important operations in recent years, about ten of which were particularly significant and led to the arrest of a large number of militants.

In view of their strategic importance, the following are worthy of note:

- "Operation Sphinx", which ended in June 1995 in Milan with the arrest of twelve Egyptians and one Jordanian considered to be linked to the subversive Egyptian group "Al Jamaa Al Islamiya",

- "Operation Shabka" (Network), which led in 1996 to the capture in various cities, including Turin, of 16 Algerians and two Moroccans suspected of being part of a cell providing logistical support to the Algerian "Armed Islamic Group" (GIA). In addition to links with Egypt, significant links emerged from this investigation with the combatants in Bosnia, to whom the groups operating in Italy provided specific logistical support. The leader of the organisation, Anwar Shaban, who escaped capture, died shortly afterwards in a gunfight in Bosnia.

- The arrest in Turin in 1998 of three Egyptians suspected of being members of the Egyptian Islamic Jihad. This was the first operation of this nature in which weapons were found. It should be pointed out that one of these individuals, who disappeared after serving over a year in prison, was later accused by the Egyptian authorities of

membership of an armed band, massacre, homicide and possession of weapons and explosives.

- The arrest, in the cities of Bologna, Varese, Ferrara, Milan and Brescia on 10 June 1998, just before the football World Cup in France, of 6 Tunisian citizens, 3 Moroccans, 3 Algerians and one Italian considered to be linked to the "Salafist faction" of the GIA led by the dissident emir Hassan Hattab (Nahla and Ritorno Operations). On 13 January 2003, 16 of the foreigners involved in the above operations were convicted by the Bologna judicial authorities with sentences ranging from 6 months to five years and 6 months.

- More recently, operation "Al Muhajirun" - divided into three linked stages, which ended respectively in April, October and November 2001 - targeted the members of an Algerian-Tunisian terrorist cell of the Salafist Group for Call and Combat (GSPC), which is active in Lombardy and is based around the Muslim Cultural Institute in Milan. The investigations enabled us to ascertain that these associates of the GSPC provided logistical support to recruit militants in order to indoctrinate them and then send them to war zones, notably Chechnya.

- In July 2002 a detailed investigation was carried out in Milan into members of a criminal association specialising in receiving and forging stolen documents. The group was made up of foreigners of Moroccan origin – some of whom already known for having had links with members of the GSPC, to which they supplied false documents – and nine warrants of arrest with imprisonment were issued against the individuals involved. On 7 January 2003 the Milan Court convicted the foreigners involved in the affair to sentences ranging from one and a half years to three years imprisonment.

- On 28 September 2002 a Tunisian citizen, against whom a warrant of arrest and imprisonment had been issued by the Bologna judicial authorities on 9 June 1998 since he

was considered to belong to a criminal organisation linked to the GIA that was dedicated to the forging of documents, dealing in counterfeit money, forgery and the receipt of illicit goods, was arrested. The person in question, who had previously fought in the mujahedin battalion during the conflict in Bosnia, was considered to be a key element in the organisation.

- On 21 February 2003 a Tunisian citizen was expelled from Switzerland. On entering Italy over the Ponte Chiasso border, the person in question was arrested since he was subject to an arrest warrant issued by the Bologna judicial authorities on 30 January for failing to respect the requirement to remain in that municipality that had been imposed following his release from prison on 26 July 2002. This Tunisian citizen had been arrested in Bologna on 15 February 2002 in application of a warrant of arrest and imprisonment issued by the Public Prosecutor's Office as part of a criminal proceeding against a cell of the "Armed Islamic Group – GIA" operating there, of which he was a member, because he was considered have participated with others in the crimes of forgery, receipt of stolen goods, dealing in counterfeit banknotes and other offences. On 13 January 2003 he was sentenced by the court of Bologna to 5 years 6 months in prison. He immediately went into hiding and moved with his family to Switzerland, where he requested political asylum. His application was turned down.

- As part of "Operation Bazar", a detailed investigation into a cell operating in Milan, with branches in other cities, is nearing conclusion. The cell provides logistical support to terrorists in transit, procures false documents and engages in proselytism and the recruitment of new members. On 9 October 2002 the investigation led to the enforcement of a warrant of arrest and imprisonment issued by the examining magistrate for Milan, against 7 individuals, seriously suspected of the international terrorism offences.

In the follow-up to these activities, taken forward in a framework of international cooperation with other investigative and intelligence bodies, links were identified with a training base in northern Kurdistan under the group "Ansar Al Islam", which is entered on the UN list of bodies belonging to or associated with Al-Qaida.

On 1 April 2003, as part of the same operation, the arrest warrant against two Tunisian citizens was implemented. The warrant had been issued by the examining magistrate of Milan for the offence of conspiracy for the purposes of international terrorism (Art. 270 bis of the penal code).

The outcome of the investigative and intelligence activities regarding radical groups operating in Italy shows how the fundamentalist cells are engaged primarily in logistical activities, mainly involving the procurement of false or counterfeit documents and the recruitment and transportation of volunteers to Afghan training centres.

This logistical role is probably the basis for the proven connections between the groups found in Italy and fundamentalist cells and groups in other European countries, including as a result of interpersonal contacts made and developed during shared training experiences or operational engagement in *jihad* theatres of action.

The fact that the cells in Italy can be linked to a European network pursuing a strategic design in line with that taken by Al-Qaida and its leader, Usama Bin Laden, and the often long-standing links connecting certain radical circles, mainly North African in origin, with crisis situations, continues to be an indicator of the danger posed by the fundamentalist groups based in Italy and by those circles, including criminal organisations, that probably gravitate around the cells under investigation.

The fact that important operations dating from the second half of the 1990s and involving Islamic fundamentalism have regarded subversive movements such as the Egyptian and Algerian ones, which we know have re-formed in more internationalist terms – if not outright affiliation to Al Qaida – leads us to view those groups, which still today seem to be the most active in the region, as the most dangerous versions of the "European branch" of fundamentalism.

Recent arrests in Northern Italy confirm the capacity of the extremist networks to regenerate themselves, the central role played by North African circles in the logistical framework of the radical network in Europe and the continuing activism of the militant movements in Italy, which clearly maintain strong links with groups in other European countries and with those territories where the ranks of Al Qaida re-grouped after the military intervention in Afghanistan.

Although the activity of intelligence agencies and the forces of law and order have not recently uncovered specific terrorist plans for attacks to be carried out in Italy, it is felt that the insidious nature of the cells in our country – which have responded to the intensified measures to identify and counter them by intensifying their own capacity for camouflage or concealment – lies in the contribution these groups have made up till now to taking forward the overall radical Islamic strategy.

The links between the fundamentalists identified in Italy and old and new theatres of operations confirm the importance of certain personalities present in Italy and by no means rule out the possibility of a shift of emphasis of the activity of these groups to a more offensive position, for example by attacks against objectives of a symbolic nature.

The news regarding the presence and transit of radical individuals/groups in the nearby Balkans, where some extremist structures seem to be intent on creating forms of intra- and trans-regional coordination, casts further light on the nature and extent of the regional threat.

II. Consolidated List

2. How has the 1267 Committee's List been incorporated within your legal system and your administrative structure, including financial supervision, police, immigration control, customs and consular authorities?

This point was discussed in the Italian report to the UN Security Council Sanctions Committee set up under Resolution 1267, presented in 2002 in accordance with Resolution 1390, notably points a), b) and c).

3. Have you encountered any problems with implementation with regard to the names and identifying information as currently included in the List? If so, please describe these problems.

In this respect the problems that were pointed out in the previous Italian report to the Sanctions Committee presented in accordance with Resolution 1390/2002 can be reiterated, particularly the fact that it is not possible to insert names in the Police Forces' common information system for which the essential identification data is not available.

4. Have your authorities identified inside your territory any designated individuals or entities? If so, please outline the actions that have been taken.

The 1267 Committee has already been sent specific Italian proposals in this respect.

5. Please submit to the Committee, to the extent possible, the names of individuals or entities associated with Usama Bin Laden or members of the Taliban or Al-Qaida that have not been included in the List, unless to do so would compromise investigations or enforcement actions.

The competent authorities are continuing to examine possible further initiatives.

6. Have any listed individuals or entities brought a lawsuit or engaged in legal proceedings against your authorities far inclusion in the List? Please specify and elaborate, as appropriate.

Only one has been filed, with the Ministry for the Economy through the Government Lawyers' Service, in January 2003, by the NASCO BUSINESS RESIDENCE CENTER S.a.s. owned by Nasreddin Ahmed Idris, requesting the total unfreezing of current bank accounts to carry out business activity. The lawsuit, submitted to the Court of Milan, was rejected because the ordinary judicial authority did not have jurisdiction in the matter. Each and every part of the European Union company law regulations is mandatory

and directly applicable in each Member State. It is not therefore possible for a national judicial authority to adopt such a provision against the freezing of assets.

7. Have you identified any of the listed individuals as nationals or residents of your country? Do your authorities have any relevant information about them not already included in the List? If so, please provide this information to the. Committee as well as similar information on listed entities, as available.

The proposals presented by Italy to this Committee included references to individuals resident in our country.

In addition, on 7 November 2001 in Campione d'Italia (CO) the villa of NADA YOUSSEF was searched. NADA YOUSSEF was born in Alexandria on 17.5.1931 and is a naturalised Italian citizen, resident in no. 32 Via Arogno of Campione d'Italia, founding partner and chairman of the BANK AL TAQWA LIMITED, established in 1987/1988 (since 6 March 2001 this structure has been called "NADA MANAGEMENT ORGANIZATION s.a.", based in Lugano-CH). NADA was accused of supplying financial and logistical support through the above-named company to the authors of the terrorist attacks in the US on 11 September 2001. He was also accused of providing funding for Al-Qaida, from 1981 on.

As regards the second question, investigations are being carried out, but these are currently covered by secrecy provisions.

8. According to your national legislation, if applicable, please describe any measures you have taken to prevent entities and individuals from recruiting or supporting Al-Qaida members in carrying out activities inside your country, and to prevent individuals from participating in Al-Qaida training camps established in your territory or in another country.

The answer to this question has already been provided at point 2 (a) of the operational paragraph of the national Report on the implementation of UN Resolution 1373 (2001), to which we would ask you to refer. The measures to combat such activities have been further strengthened through Law 7 of 14 January 2003

ratifying and implementing the International Convention for the Suppression of the Financing of Terrorism made at New York on 9 December 1999, which introduced provisions bringing the domestic legislation into line.

III. Financial and Economic Assets Freeze

9. Please describe briefly:

- **the domestic legal basis to implement the asset freeze required by the resolutions above;**
- **any impediments under your domestic law in this context and steps taken to address them.**

This question has already been answered at point a) of the Italian report to the UN Security Council Sanctions Committee established by Resolution 1267, presented in 2002 in accordance with Resolution 1390.

10. Please describe any structures or mechanisms in place within your Government to identity and investigate Usama bin Laden, Al-Qaida or Taliban-related financial networks, or those who provide support to them or individuals, groups, undertakings and entities associated with them within your jurisdiction. Please indicate, as appropriate, how your efforts are coordinated nationally, regionally and/or internationally.

In addition to the information provided at point 1(a) of the operational paragraph of the national report on the implementation of UN Resolution 1373 (2001), to which we would ask you to refer, the following points are also worthy of note.

The Financial Security Committee (FSC) was created to monitor Italian action against the financing of terrorism and to enhance the co-ordination of the different competent agencies. The FSC is the competent authority for EU legislation relating to financing sanctions.

The FSC promoted the adoption of Law 431/01 setting penalties for violating the freezing of assets imposed on terrorists. Asset freezing is normally decided through a EU regulation, either autonomously or as a consequence of a UNSC decision. Art. 2 of

Law 431/01 establishes that any act that infringes EU provisions concerning asset freezing (but also the prohibition of exports of goods and services and the bans on flights) is invalid and incurs penalties. Penalties are automatically applicable under any new EU regulation.

The suppression of terrorist financing requires an active role on the part of banks and financial intermediaries. The FSC has promoted (art.3 of Law 431/01) the extension of the scope of the powers of the Ufficio Italiano dei Cambi (UIC), the Italian FIU, to include countering the financing of terrorists. The UIC reporting system and connected financial investigative activities are now used to discover early signals of terrorist involvement in the Italian financial system. The UIC has issued specific instructions to banks and financial intermediaries, asking them to report any transaction that could be related to individuals and organisations involved in terrorist activities. The UIC holds on its web-site an updated list of terrorists whose assets are subject to freezing.

The FSC has issued specific guidelines for the application of freezing orders to cover of issues like homonymy and derogation from the freezing order. The UIC has transmitted these guidelines to financial intermediaries.

The Committee contributed to drawing up the list of terrorists as for UNSCR 1390 and is considering further submissions.

In the preparation of these lists the Committee has acquired intelligence and information in the possession of Government Departments and other Administrations, even if this involves waiving the Official Secrecy Act; the Committee may also request further investigations by the Ufficio Italiano dei Cambi, CONSOB and the "Guardia di Finanza" (Financial Police).

The international nature of terrorist financing means that countries must work together and share information in order to identify and take effective action against it. To this end, the FSC has encouraged cooperation among Financial Intelligence Units to collect and share information on money laundering and terrorist financing.

The need to coordinate the efforts that have been made to identify the financial networks of Bin Laden, Al Qaida and the Taliban, the individuals or groups who provide them with support and the individuals, group, activities and bodies associated with them have been translated, as far as the intelligence sector is

concerned, into the creation of a special Committee that brings together representatives of the information services, the Ministry for the Economy and Finance, the Ministry of Foreign Affairs and the Ministry of Productive Activities. Reference has already been made to this Committee at sub-paragraph 1(a) of the national supplementary report presented to the CTC in November 2002.

11. Please convey the steps banks and/or other financial institutions are required to take to locate and identify assets attributable to, or for the benefit of, Usama bin Laden or members of Al-Qaida or the Taliban, or associated entities or individuals. Please describe any "due diligence" or "know your customer" requirements. Please indicate how these requirements are enforced, including the names and activities of agencies responsible for oversight.

The answer to this question is provided in point 1 (c), third question, of the operational paragraph of the national supplementary report on the implementation of UN Resolution 1373 (2001), to which we would ask you to refer.

12. Resolution 1455 (2003) calls on Member States to provide "a comprehensive summary of frozen assets of listed individuals and entities."

Please provide a list of the assets that have been frozen in accordance with this resolution. This list should also include assets frozen pursuant to resolutions 1267 (1999), 1333 (2001) and 1390 (2002). Please include, to the extent possible, in each listing the following information:

- **identification(s) of the person or entities whose assets have been frozen;**
- **a description of the nature of the assets frozen (i.e., bank deposits, securities, business assets, precious commodities, works of art, real estate property, and other assets);**
- **the value of the assets frozen.**

A comprehensive summary is contained in the attached table, drawn up by the FSC.

13. Please indicate whether you have released, pursuant to resolution 1452 (2002), any funds, financial assets or economic assets that had previously been frozen as being related to Usama Bin Laden or members of Al-Qaida or the Taliban or associated individuals or entities. If so, please provide reasons, amounts unfrozen or released and dates.

To date, the FSC, the competent authority in this area, has not received any request for exemptions.

14. Pursuant to resolution 1455 (2003), 1390 (2001), 1333 (2000) and 1267 (1999), States are to ensure that no funds, financial assets or economic resources are made available, directly or indirectly, to listed individuals or entities or for their benefit, by nationals or by any persons within their territory. Please indicate the domestic legal basis, including a brief description of laws, regulations and/or procedures in place in your country to control the movements of such funds or assets to designated individuals and entities. This section should include a description of:

- **The methodology, if any, used to inform banks and other financial institutions of the restrictions placed upon individuals or entities listed by the Committee, or who have otherwise been identified as members or associates of Al-Qaida or the Taliban. This section should include an indication of the types of institutions informed and the methods used.**
- **Required bank-reporting procedures, if any, including the use of Suspicious Transaction Reports (STR), and how such reports are reviewed and evaluated**
- **Requirements, if any, placed on financial institutions other than banks to provide STR, and how such reports are reviewed and evaluated.**
- **Restrictions or regulations, if any, placed on the movement of precious commodities such as gold, diamonds and other related items.**

- **Restrictions or regulations, if any, applicable to alternate remittance systems such as -- or similar to -- "hawala", as well as to charities, cultural and other non-profit organizations engaged in the collection and disbursement of funds for social or charitable purposes.**

As regards the system for the prevention of market abuse Legislative Decree 374 of 25 September 1999 extends the provisions concerning recycling, contained in Law 197/1991, to financial activities particularly susceptible to use for illicit purposes and envisages oversight by the UIC and powers of inspection by the same body and by the special currency unit of the Guardia di Finanza. Art. 3 defines "financial agencies" and establishes an obligatory requirement on both financial and non-financial intermediaries to respect the obligations of identification, registration and notification of suspect operations. As envisaged by Legislative Decree 374/1999, Ministerial Decree no. 485 of 13 December 2001 regulates the activity of the agencies in financial activities. Finally, Law no. 73 of 22 April 2002 includes a provision extending the scope of the competencies and powers of the UIC and the Guardia di Finanza to actions to counter the financing of terrorist activities.

Law 460 of 4 December 1997 reorganised the sector through the creation of a category entitled Non-profit Organisations of Social Utility (ONLUS), defined as non profit organisations with social solidarity goals, either sports-related, social, cultural, educational, political or charitable, in most cases outside the economic sector. The ONLUS can be associations (registered or unregistered), foundations or fund-raising committees. Regulation 329 of 21 March 2001 states that the ONLUS should be overseen by a regulatory body, the "Agenzia per le ONLUS", which reports to the Prime Minister's Office on a yearly basis. Because of the very short time that has passed since its creation, a number of issues regarding its tasks and governance are still pending. I aw 460/97 does not envisage any watchdog/accreditation organisation to monitor charitable fundraising on behalf of the donor community. The donor community is not precluded from organising such a monitoring system. According to Law 460/97, ONLUS are required to report on their finances by separately drawing up the balance sheet and the annual rendering account. In addition, pursuant to

Regulation no. 329/2001 the "Agenzia" for the ONLUS has the power of supervision over the non-profit sector. The Italian legislator requires all non profit organisations that are willing to obtain ONLUS status to enrol in Registers held by the local office of the Ministry of the Economy and Finance. The ONLUS Register was set up only recently and until now has been used mainly for fiscal purposes. Further developments are expected shortly. Finally, ONLUS are required to mention the word ONLUS in their denomination, as well as in all distinctive marks and communications addressed to the public.

With regard the other aspects (sub-points 1-2-3-4), please refer to point a) of the Italian report to the UN Security Council Sanctions Committee set up pursuant to Resolution 1267, presented in 2002 in accordance with Resolution 1390.

IV. Travel Ban

Under the sanctions regime, all States shall take measures to prevent the entry into or transit through their territories of listed individuals (paragraph 1 of resolution 1455 (2003), paragraph 2b of resolution 1390 (2002)).

15. Please provide an outline of the legislative and/or administrative measures, if any, taken to implement the travel ban.

An answer to this question is provided in the national Report on the implementation of Resolution 1373 (2001), more specifically at point 2 (g).

16. Have you included the names of the listed individuals in your national "stop list" or border checkpoint list? Please briefly outline steps taken and any problems encountered.

Those names entered on the Sanctions Committee Lists that include the minimum identification data for insertion (name/surname, date and place of birth) have been entered in the national border control lists.

17. How often do you transmit the updated List to your border control authorities? Do you possess the capability of searching List data using electronic means at all your entry points?

Each time the list is up-dated the competent offices of the Frontier Police are promptly informed.

At the national level all Frontier Police posts (including those under the responsibility of the Carabinieri and Guardia di Finanza), as well as the Questura police administration and local offices, are linked to the central inter-force database known as the SDI.

As far as the individuals entered on list 1390 (2002) are concerned, those for whom the minimum identification details required by the IT system are available have been inserted. In practice, only individuals whose name/surname, date and place of birth and nationality are know n can be inserted.

As a result of these restrictions those names for which the minimum details were available have been inserted in the SDI-border list for the purposes of the ban on entry to Italian territory.

18. Have you stopped any of the listed individuals at any of your border points or while transiting your territory? If so, please provide additional information, as appropriate.

Subsequent to their inclusion in the list, none of the individuals has been identified at the border or on Italian territory by central or local Police offices.

19. Please provide an outline of the measures, if any, taken to incorporate the List in the reference database of your Consular offices. Have your visa-issuing authorities identified any visa applicant whose name appears on the List?

As we have already informed the Monitoring Group for the implementation of Resolution 1390, Italy has sent the updated list of individuals covered by the sanctions to all diplomatic and consular missions abroad. On the basis of the checks that have been carried out no name from the list has been identified by the visa-issuing authorities.

V. Arms Embargo

Under the sanctions regime, all States are requested to prevent the direct or indirect supply, sale and transfer, to Usama bin Laden, members of Al-Qaida organization and the Taliban and other individuals and entities associated with them, from their territories or by their nationals outside their territories of arms and related materiel of all types, including the provision of spare parts and technical advice, assistance, or training related to military activities (paragraph 2(c) of resolution 1390 (2002) and paragraph 1 of resolution 1455 (2003)).

20. What measures, if any, do you now have in place to prevent the acquisition of conventional arms and weapons of mass destruction (WMD) by Usama bin Laden, members of Al-Qaida organization and the Taliban and other individuals, groups, undertakings and entities associated with them? What kind of export control do you have in place to prevent the above targets from obtaining the items and technology necessary for weapons development and production?

21. What measures, if any, have you adopted to criminalize the violation of the arms embargo directed at Usama bin Laden, members of Al-Qaida organization and the Taliban and other individuals, groups, undertakings and entities associated with them?

22. Please describe how your arms/arms broker licensing system, if any, can prevent Usama bin Laden, members of Al-Qaida organization and the Taliban and other individuals, groups, undertakings and entities associated with them from obtaining items under the established arms embargo.

23. Do you have any safeguards that the weapons and ammunition produced within your country will not be diverted/used by Usama bin Laden, members of Al-Qaida

organization. and the Taliban and other individuals, groups, undertakings and entities associated with them?

This question has already been answered at point c) of the Italian Report to the UN Security Council Sanctions Committee set up by Resolution 1267, presented in 2002 in accordance with Resolution 1390.

VI. Assistance and Conclusion

24. Would your state be willing or able to provide assistance to other States to help them implement the measures contained in the above-mentioned resolutions? If so, please provide additional details or proposals.

Italy has submitted an official report to the CTC as a contribution to the task of drawing up the "directories of assistance" for the fight against terrorism.

25. Please identify areas, if any, of any incomplete implementation of the Taliban/Al-Qaida sanctions regime, and where you believe specific assistance or capacity building would improve your ability to implement the above sanctions regime.

The most serious problems to emerge thus far in the implementation of the sanctions envisaged by the Resolutions in question are essentially connected with the difficulty of inserting in the IT systems those names for which the minimum identification data are not available.

In addition, the problem of identifying who should be responsible for inserting the names from this list in the Schengen Information System is still under consideration by the European Union.

26. Please include any additional information you believe pertinent.

Please refer to the introduction to the report.